

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VE,

*Plaintiff,*

v.

DARREN K. INDYKE AND RICHARD D. KAHN,  
AS JOINT PERSONAL REPRESENTATIVES OF  
THE ESTATE OF JEFFREY E. EPSTEIN, NINE  
EAST 71st STREET, CORPORATION, FINANCIAL  
TRUST COMPANY, INC., NES, LLC,

*Defendants.*

Case No. 1:19-07625-AJN-DCF

**JOINT STIPULATION AND [PROPOSED] ORDER STAYING ACTION**

*DF*

WHEREAS independent claims administration experts have designed and are implementing the Epstein Victims' Compensation Program (the "Program") to resolve sexual abuse claims against decedent Jeffrey E. Epstein ("Decedent") in a non-adversarial alternative to litigation; and

WHEREAS Plaintiff VE ("Plaintiff," and together with Defendants, Darren K. Indyke and Richard D. Kahn, as Co-Executors of the Estate of Jeffrey E. Epstein, Nine East 71st Street, Corporation, Financial Trust Company, Inc., and NES, LLC, the "Parties") seeks to participate in the Program; and

WHEREAS the Parties seek to preserve their resources and judicial economy by staying this action unless and until Plaintiff elects to resume the litigation and requests the stay be lifted; and

WHEREAS should Plaintiff resolve her claims against Defendants via the Program, the Parties will thereafter promptly discontinue this action with prejudice.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, that:

1. The captioned action is hereby stayed pending further Order of the Court.
2. After the lifting of the stay, if any, the Parties will confer on a schedule for the remaining discovery in this action.

Dated: June 12, 2020  
New York, New York

Respectfully submitted,  
EDWARDS POTTINGER LLC

By: /s/ Brad Edwards

Brad Edwards  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301  
Tel: (954) 524-2820  
brad@epllc.com

*Attorneys for Plaintiff*

TROUTMAN SANDERS LLP

By: /s/Bennet Moskowitz

Bennet J. Moskowitz  
875 Third Avenue  
New York, NY 10022  
(212) 704-6000  
bennet.moskowitz@troutman.com

*Attorneys for Defendants*

The parties are directed to submit a joint status report  
no later than 8/14/2020.

Date: June 15, 2020  
New York, New York

  
HON. DEBRA C. FREEMAN  
United States District Judge  
Hon. Debra Freeman, U.S.M.J.